

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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*David E. Patton*  
Executive Director  
and Attorney-in-Chief

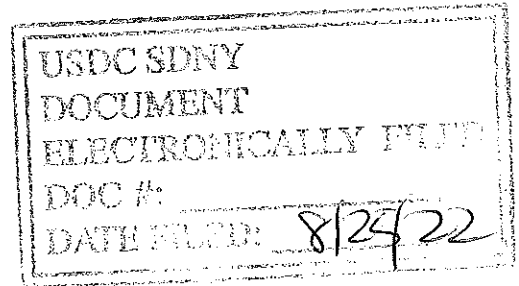
Southern District of New York  
*Jennifer L. Brown*  
Attorney-in-Charge

August 25, 2022

**BY ECF & EMAIL**

Honorable Judge Paul E. Davison  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: **United States v. Juan Morel**  
**22 Mj. 5102 (UA)**



Dear Judge Davison:

I write on behalf of my client, Juan Morel, to respectfully seek a temporary modification to Mr. Morel's bail conditions to allow him to travel between his home in New Rochelle, New York and Tenaflly, New Jersey from September 7, 2022 to September 21, 2022. Mr. Morel works installing skylights, and his employer has a job in Tenaflly on those dates. If approved, Mr. Morel would leave his home each morning to reach the job site by 6:00am and depart the job site by 6:00pm to return back home. ]

I have communicated with the government and Pretrial Services, and they do not object to this request. I appreciate the Court's consideration of this matter.

Respectfully submitted,

/s/ Mark B. Gombiner  
Mark B. Gombiner, Esq.  
Assistant Federal Defender  
Tel.: (212) 417-8718

**APPLICATION GRANTED**

A handwritten signature in dark ink, appearing to read "Paul E. Davison", written over a horizontal line.

Hon. Paul E. Davison, U.S.M.J.

**8-25-22**

cc: AUSA Kingdar Prussien (by ECF)  
Leo Barrios, Pretrial Services Officer (by E-mail)